

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

TRAXCELL TECHNOLOGIES, LLC,

Plaintiff,

v.

NOKIA SOLUTIONS AND NETWORKS US  
LLC; NOKIA SOLUTIONS AND  
NETWORKS OY; NOKIA CORPORATION;  
NOKIA TECHNOLOGIES OY; ALCATEL-  
LUCENT USA, INC.; HMD GLOBAL OY;  
AND T-MOBILE, USA, INC.,

Defendants.

CASE NO. 2:18-CV-00412-RWS-RSP

**STIPULATION OF DISMISSAL**

WHEREAS Plaintiff Traxcell Technologies LLC (“Traxcell”) and Defendant HMD Global Oy (“HMD,” and collectively, the “Parties”) seek to avoid incurring further expenses in this matter, and

WHEREAS HMD has therefore agreed to forgo filing a motion to recover the attorneys’ fees and costs it has incurred addressing Traxcell’s attempts to effect service, and Traxcell has agreed to dismissal of all claims against HMD with prejudice,

THEREFORE, the Parties jointly move the Court to enter the enclosed stipulated Order of Dismissal.

Dated: November 5, 2019

Respectfully submitted,

/s/ William J. McCabe

JOHN D. PENN, Bar No. 15752300

JPenn@perkinscoie.com

PERKINS COIE LLP

500 N. Akard Street, Suite 3300

Dallas, Texas 75201

Phone: (214) 965-7700

Fax: (214) 965-7799

WILLIAM J. MCCABE

WMcCabe@PerkinsCoie.com

MATTHEW J. MOFFA

MMoffa@PerkinsCoie.com

THOMAS V. MATTHEW

TMatthew@PerkinsCoie.com

PERKINS COIE LLP

1155 Avenue of the Americas, 22nd Floor

New York, New York 10036-2711

Phone: (212) 262-6900

Fax: (212) 977-1649

*Attorneys for Defendant HMD Global Oy*

Ramey & Schwaller, LLP

/s/ William P. Ramey, III, with permission, by  
William J. McCabe

William P. Ramey, III

Texas Bar No. 24027643

5020 Montrose Blvd., Suite 750

Houston, Texas 77006

(713) 426-3923 (telephone)

(832) 900-4941 (fax)

wramey@rameyfirm.com

Hicks Thomas LLP

John B. Thomas

jthomas@hicks-thomas.com

Texas Bar No. 19856150

700 Louisiana Street, Suite 2000

Houston, Texas 77002

Telephone: (713) 547-9100

Facsimile: (713) 547-9150

*Attorneys for Traxcell Technologies, LLC*